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9 (California Bar Number 86361; admitted *pro hac vice*)
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11 100 Bayview Circle, Suite 5600
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14 *Co-Lead/Liaison Counsel for Plaintiffs*

GALLAGHER & KENNEDY, P.A.
2575 EAST CAMELBACK ROAD
PHOENIX, ARIZONA 85016-9225
(602) 530-8000

15 IN THE UNITED STATES DISTRICT COURT

16 FOR THE DISTRICT OF ARIZONA

17 In Re Bard IVC Filters Products
18 Liability Litigation

19 No. MD-15-02641-PHX-DGC

20 PLAINTIFFS' NOTICE OF VIDEOTAPED
21 DEPOSITION OF KAY FULLER

22 PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 26 and 30, Plaintiffs will
23 take the videotaped deposition of Kay Fuller of Ann Arbor, Michigan, upon oral examination
24 before an officer authorized by law to administer oaths commencing at 9:00 a.m. on
25 January 11, 2016, at Gallagher & Kennedy, 2575 East Camelback Road, Phoenix, Arizona
26 85016-9225, and continuing thereafter from time to time until concluded.

1 DATED this 20th day of December, 2015.

2 GALLAGHER & KENNEDY, P.A.

3 By: /s/Robert W. Boatman

4 Robert W. Boatman

5 Paul L. Stoller

Shannon L. Clark

2575 East Camelback Road

Phoenix, Arizona 85016-9225

6 LOPEZ McHUGH LLP

7 Ramon Rossi Lopez (CA Bar No. 86361)

8 (admitted *pro hac vice*)

100 Bayview Circle, Suite 5600

Newport Beach, California 92660

9 *Co-Lead/Liaison Counsel for Plaintiffs*

11 I hereby certify that on this 20th day of December, 2015, I electronically transmitted
12 the attached document to the Clerk's Office using the CM/ECF System for filing and
13 transmittal of a Notice of Electronic Filing.

14 *Counsel will be served in accordance
15 with the Court's Case Management Order No. 1

16 Mary E. Torrez

17 5166512/26997-1